

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:)	Bankruptcy No. 14-24782-GLT
Robert J. Ahart)	Chapter 13
Karen E. Ahart, Karen E. Engle)	Doc No. __
Debtor)	Response Due: 02/26/2018
Bryan Keenan, Esquire)	Hearing date: 3/28/2018
APPLICANT)	at 10:30 a.m.
vs.)	
No Respondent(s))	

**CASE NARRATIVE AND HISTORY FILED
TO COMPLY WITH W.PA.LBR 2016-1 IN SUPPORT OF
APPLICATION OF BRYAN P. KEENAN, ESQUIRE FOR
INTERIM COMPENSATION AND REIMBURSEMENT
OF EXPENSES AS COUNSEL FOR THE DEBTOR**

1. The Debtors retained counsel to file for relief under Chapter 13 of the Bankruptcy Code on December 7, 2014 to prevent a mortgage foreclosure of their home and their rental property in New York.

2. The Debtor husband was required through his employment to relocate from New York to Pennsylvania.

3. Prior to filing the Debtors tried to sell their home in New York, which they were unable to do.

4. On the even of filing they managed to rent it.

5. The September 24 2015 Chapter 13 plan contemplated curing and reinstating the mortgages on their residence in Pennsylvania and the New York Rental property.

6. The tenants vacated the rental property and an Amended plan has been filed on was filed on June 15, 2017 to surrender their interest in the New York property.

7. The Debtors are current on their payments, which are being reemitted through a wage attachment.

.
.

8. At the conciliation conference a final confirmation order was entered in connection with the Debtor's Chapter 13 plan dated October 11, 2013.

9. Throughout the duration of the plan debtor's counsel has addressed all questions and concerns raised by the debtor.

10. There have been a number of wage attachment and wage termination motions filed since the debtor is employed through the union and the source of his pay check changes frequently.

11. The Debtor filed a Motion and an Order was entered avoiding a Judicial lien.

12. Debtors Counsel has filed Declarations to provide for Notice of Mortgage Payment changes.

13. The debtor defaulted on his plan payments and an amended plan was filed on July 7, 2017 to cure the post petition arrears.

14. On August 18, 2017 a confirmation order was entered confirming the July 7, 2017 Amended Chapter 13 Plan.

It is hereby respectfully requested that the Order attached to the Application be entered by the Court.

Date: February 9, 2018

/s/ Bryan P. Keenan
Bryan P. Keenan, PA ID No. 89053
Bryan P. Keenan & Associates P.C.
Attorney for Debtor
993 Greentree Road, Suite 101
Pittsburgh, PA 15220
(412) 922-5116
keenan662@gmail.com